

**Remarks**

Claims 108-127 are pending, and claims 108-127 stand rejected. Applicants respectfully traverse the rejection and request allowance of claims 108-127.

**35 U.S.C. § 103 Rejection**

The Examiner rejected claims 108-127 under 35 U.S.C. § 103 in view of U.S. Patent number 5,483,589 (Ishida), U.S. Patent number 5,805,690 (Koepper), and Newton's Telecom Dictionary. The Applicants submit that claims 108-127 are non-obvious over the combination of Ishida, Koepper, and Newton's Telecom Dictionary based on the following remarks.

(1) Claim 108 describes the limitation of "*a call processing control system ... configured to receive call processing data from the signaling processors, process the call processing data to generate updated call processing tables, and transmit the updated call processing tables to the signaling processors to remotely control call processing.*" The Examiner admits that Ishida does not teach updating call processing tables, so Ishida will not be discussed for this limitation. The Examiner suggests that Koepper teaches the call processing control system as described in claim 108. The Applicants disagree.

Koepper describes a distributed transit PBX that includes a plurality of D-Channel Server Modules (DSM) (see FIG. 4). Each DSM includes a local routing table and a remote routing table (see FIG. 5). When a DSM receives a call request that includes an Exchange Code (EC), the DSM searches the local routing table for the EC and routes the call request to a PBX connected to that DSM (see column 7, lines 7-11). If the EC is not found in the local routing table, the DSM searches the remote routing table for a remote DSM serving that EC and routes the call request to the remote DSM (see column 7, lines 11-16). In the event that a new EC is added or an EC is changed in any of the DSMs, that DSM updates its routing tables and broadcasts the update to all of the other DSMs (see column 8, lines 16-24).

Koepper is different than claim 108. First of all, Koepper does not teach a centralized call processing control system that receives call processing data from each of the DSMs, and processes the call processing data to update call processing tables. If anything, a DSM in Koepper corresponds with a signaling processor in claim 108. There is no centralized call

processing control system connected to each DSM that collects data from the DSMs and updates the routing tables in the DSMs. The DSMs update themselves, so there is no need for a centralized call processing control system to collect data and update the routing tables.

Secondly, the Examiner cannot assume that a DSM is equivalent to a call processing control system as described in claim 108. As provided by claim 108, the call processing control system *receives call processing data from each signaling processor* and updates the call routing tables *based on the call processing data received*. A DSM in Koepper *does not receive call processing data from the other DSMs*, update the call routing tables based on the data collected from the other DSMs, and then transmit the updated routing tables to the other DSMs. When a DSM in Koepper receives a new EC and updates its own routing tables based on the new EC, that EC is not received from the other DSMs. In other words, the new EC is not equivalent to receiving call processing data as provided in claim 108. Therefore, Koepper does not teach this limitation of claim 108.

(2) Claim 108 also describes the limitations of "*a plurality of connection systems ... receive a control message that includes an identifier for routing the call, interwork the user communications based on the identifier in the control message, and transmit the user communications that include the identifier for routing the call*". Because the connection systems are interworking user communications based on identifiers from signaling processors, the signaling processors and the connection systems *control the point of interworking*.

In rejecting this limitation, the Examiner cites the combination of Ishida and Newton's Telecom Dictionary. Even if Newton's defines interworking, the combination of Ishida and Newton's does not teach or suggest *controlling the point of interworking* as provided in claim 108. Assuming that Ishida does interwork communications between switches of the destination countries (even though Ishida does not mention interworking), Ishida still does not teach controlling the point of interworking. Traditional interworking is performed by static tables (see U.S. Patent 5,568,475 (Doshi)). For instance, for TDM to ATM interworking, the static table is used to map incoming trunks of the TDM network to VC/VPs of the ATM network. With static mapping such as this, there is no controlling of the point of interworking as in claim 108. The interworking in claim 108 is not controlled by a static map, but is controlled by the identifier provided by the signaling processor. Therefore, the combination of Ishida and Newton's does

not teach this limitation of claim 108.

Conclusion

Based on the above remarks, the Applicants submit that claim 108 is non-obvious in view of the combination of Ishida, Koepper, Newton's Telecom Dictionary. Claim 118 is non-obvious for similar reasons. The dependent claims are non-obvious as being dependent on one of claims 108 or 118. There may be additional reasons in support of patentability, but such reasons are omitted in the interests of brevity. The Applicants respectfully request allowance of claims 108-127. Any fees in addition to those submitted may be charged to deposit account 21-0765.

Respectfully submitted,

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